

3.3 CULTURAL RESOURCES

3.3.1. INTRODUCTION

The purpose of this section of the EIR is to examine the potential historic, archeological, cultural, and paleontological effects that may occur as a result of the proposed Reynolds Ranch Project. Pacific Legacy Inc. was retained to conduct a Cultural and Paleontological Resources assessment of the site. Pacific Legacy presented the results of their investigation in a report titled "Cultural Resources Inventory Report" dated May 2006. This report is included in this EIR as Appendix D. This section of the EIR is based largely on the findings of the Pacific Legacy investigation as well as information contained in the City of Lodi General Plan.

Initial consultation was made to the Native American Heritage Commission (NAHC) regarding the project. The Commission's response letter identified ten individuals and groups with potential interest in the project and stated that no Sacred Lands are on file within the project area. Letters requesting information and/or concerns regarding the project area were sent to the listed Native American contacts, and follow-up phone calls have been made to each representative. Records of correspondence with the NAHC and potentially interested groups/individuals are contained in the appendices of the project's "Cultural Resources Inventory Report" (Appendix D of this EIR). No responses have been received.

3.3.2. REGULATORY FRAMEWORK

Cultural resource is a term that refers to the imprint of human occupation left on the landscape. This imprint is manifested in the form of prehistoric and historic archaeological sites, and historic buildings, structures, and objects. Archaeological sites consist of artifacts, plant and faunal remains, trash deposits, and many types of features. Artifacts reflect anything that was manufactured or modified by human hands. Features can include structural remains, fire pits, and storage areas.

Historic archaeological sites reflect occupation after the advent of written records. Material remains of historic archaeological sites include: refuse dumps, structure foundations, roads, privies, or any other physical evidence of historic occupation. Refuse consists of food waste, bottles, ceramic dinnerware, and cans. In a number of historic archaeological situations privies are important because they often served as secondary trash deposits. There is usually a strong interplay between historic archaeological sites and written records. The archaeological data is frequently used to verify or supplement historic records. Historic buildings include: commercial and residential buildings, industrial space, and any other building that can accommodate people. Historic structures include facilities such as bridges, roadways, and objects.

The California Environmental Quality Act (CEQA) requires that for public or private projects financed or approved by public agencies, the effects of the project on historical resources and unique archaeological resources be assessed. Historical resources are defined as buildings, sites, structures, objects, or districts, each of which may have historical, architectural, archaeological, cultural, or scientific significance, that have been

determined to be eligible for listing in the California Register of Historical Resources (CRHR). Properties listed in the National Register of Historic Places (NRHP) are automatically eligible for listing in the CRHR.

CEQA also requires that if a project would result in an impact that may adversely affect the significance of a historical resource or a unique archaeological resource, avoidance or mitigation measures will be considered. These measures only involve significant cultural resources. Consequently, the significance of resources will be determined before project effects are identified, or mitigation measures are developed.

As defined by Section 15064.5(a)(3)(A-D) of the State CEQA Guidelines, a cultural resource shall be considered historically significant if it meets the criteria for listing on the California Register of Historical Resources as defined in the following criteria:

- A. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; or
- B. Is associated with the lives of persons important in our past;
- C. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- D. Has yielded, or may be likely to yield, information important in prehistory or history.

Criterion D of Section 15064.5(a)(3)(A-D) of the State CEQA Guidelines generally, but not always, applies to archaeological sites, rather than in the evaluation of most historic architectural structures, and is not employed for evaluating historic resources in this analysis.

California Public Resources Code Section 21083.6 defines a unique archaeological resource as an artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any one of the following:

- Contains information needed to answer important scientific research questions and there is a demonstrable public interest in that information;
- Has a special and particular quality, such as being the oldest, last or largest of its type, or the best available example of its type; and/or,
- It is directly associated with a scientifically recognized important prehistoric or historic event or person.

3.3.3. ENVIRONMENTAL SETTING

Setting of the Project Site and Vicinity

The proposed Reynolds Ranch Project is located immediately outside the current City of Lodi boundaries but within the City's sphere of influence that extends to the southeast. The site is a rectangular-shaped area principally bounded by the UPRR to the west, Harney Lane to the north, State Route 99 to the east, and the more distant Scottsdale Road to the south. The project site consists of twenty-two (22) parcels covering a total of 220 acres. The development concept for the site calls for a mix of uses, including a 40-acre retail center, a 20-acre office complex, 96 acres of residential land encompassing a variety of housing products, a 14-acre school site, 27 acres of parkland, 5.3 acres of mini-storage and a one-acre fire station site with supporting infrastructure. The project site is located within Township 3 north, Range 6 east, Northeast corner of Section 24, as depicted on Lodi South, California 7.5-minute Topographic Quadrangle (USGS 1968 revised 1976).

The Study Area ranges in elevation from between 40 to 48 ft. above mean sea level (Lodi, South Quadrangle, 1976) and experiences a Mediterranean climate characterized by warm summers and mild wet winters. The summer temperatures commonly exceeded 100° F, with the hottest months falling between May and September. The city's average annual precipitation is 18 inches with the majority of rain falling between November and April (Western Regional Climate Center 2005).

The vegetation of the contemporary Study Area can be described as rural grasslands, planted with vineyards, orchards, and ornamentals. Ground disturbance over the last century includes plowing of agricultural fields and grading for roads and residential construction, resulting in the disappearance of most native plants and animals (Schultze 1988). The project area today supports small mammals and bird species. In the past, a more varied environment would have provided very different types of habitat that would have supported a variety of plant and animal species, including bear, elk, and pronghorn.

Cultural Context of the Region

The following is adapted from the project's "Cultural Resources Inventory Report" (Appendix D) prepared by Pacific Legacy.

Prehistory

Native American groups first occupied the Central Valley at least 12,000 years ago, although evidence of early occupation in the valley is somewhat limited (Fagan 2003; Moratto 1984). More recent prehistoric human occupation is better-documented, and the archaeological record for later period sites provides a clearer understanding of human behavior and material culture. Amateur archaeologists conducted investigations in the Central Valley between 1893 and 1901. J. A. Barr focused on excavated mounds near Stockton, which were later interpreted and published by E. J. Dawson and W. E.

Schenck who reported investigations of over 90 archaeological sites in the region (Schenck and Dawson 1929).

Based on numerous investigations in the 1930's, Lillard and Purves (1936) developed a three-stage cultural sequence comprised of "cultural levels": Early, Intermediate and Late. This sequence was later elaborated on by Lillard et al. (1939), proposing a Delta Sequence, composed of periods (Lillard et al 1939). The Delta Sequence evolved into the cultural horizons (Early, Middle and Late) of the Central California Taxonomic System (CCTS), as a result of elaboration by (Beardsley 1948, 1954), Heizer (1949), and Ragir (1972),

Many researchers believe that the CCTS did not reflect the diversity in the archaeological record of Central California. Frederickson (1973, 1974) addressed the shortcoming of the CCTS, proposing "patterns" that are spatially but not temporally bound unlike the previous chronological sequences of the 1930's. Fredrickson (1973) defines three patterns for central California: Windmill (Early Horizon), Berkeley (Middle Horizon), and Augustine Patterns (Late Horizon).

- The Windmill Pattern spans from approximately 4500 to 3000 B.P.¹, focusing primarily on the Central Valley and Delta region. The economy was based on exploitation of a wide variety of terrestrial and aquatic animal species. A seasonal adaptation of winter habitation sites in the valley and summer camps in the foothills (Fredrickson 1973).
- The Berkeley Pattern (3500-1500 B.P.), defined by a higher proportion of grinding implements to projectile points, implies a greater emphasis on the exploitation of the acorn as a food resource. Archaeological data from a number of Berkeley Patterns sites and depth of the cultural deposits suggest larger populations than the earlier Windmill Pattern. The Berkeley Pattern suggests local and regional variation, gradual expansion or assimilation of different populations rather than abrupt population replacement, and gradual economic change (Fredrickson 1973:116-133).
- The Augustine Pattern (1500-European contact) is defined by a change in the overall general subsistence patterns. Acorns become the dominant food source and bow and arrow technology is introduced during this period. Trade appears to have expanded during this period, and may represent Wintuan population expansion from the north, stimulating a blending of new traits with the established Berkeley Pattern (Johnson 1976:214). This period is identified by intensification of exchange and subsistence activities and population growth.

Investigations into Central Valley prehistory San Joaquin County affirm that Central Valley peoples generally occupied sites along the banks of major waterways, streams and wetland areas. However,¹ it is possible that much of the archaeological record for the region is buried beneath vast alluvial deposits during the last 9,000 years.

¹ B.P. = Before Present

Consequently, cultural material can be revealed unexpectedly during excavation throughout the Central Valley.

History

Prior to European contact, the project area was inhabited by the Northern Valley Yokuts. The ethnographic territory of the Northern Valley Yokuts is defined by the crest of the Diablo Range to the west and the foothills of the Sierra Nevada to the east. The southern boundary extended to where the San Joaquin River bends northward, and their northern boundary was between the Calaveras and Mokelumne rivers.

The Southern Valley Yokuts and the Foothill Yokuts dialects formed the Yokutsan linguistic family of the Penutian Stock (Shipley 1978). Settlements composed of single-family dwellings, sweathouses, and ceremonial structures were located near or on banks of larger watercourses. They lead a semi-sedentary lifestyle, moving during seed procurement and spring flooding (Wallace 1978:462-470). The Yokuts relied heavily on salmon, waterfowl, large mammals and acorns for subsistence (Wallace 1978:464). Acorns were gathered from groves of valley oaks and ground into meal and cooked as a soup or gruel. Spawning salmon were caught in the fall and spring using harpoon and dragnets. Their technology included pottery, baskets, nets, bow and arrow, bedrock mortars, pestles, portable mortars, and flake stone stools to hunt and gather, process, cook and store various foods. Flake stone tools were made from cryptocrystalline silicates and obsidian provided by the Paiute and Shoshone groups on the eastern side of the Sierra. The Salinan and Coastanoan groups provided shell beads and mussels. The Yokuts traded with Miwok groups for baskets and bows and arrows.

Spaniards explored the Sacramento Delta in the early 1800's. As a result, Yokut populations declined due to relocation in to Spanish missions. In 1833 Yokut populations were decimated 75% by the malaria outbreak. The 1848 discovery of gold in the Sierra Nevada increased California's European population substantially, and severely impacted the Yokuts. This influx of Europeans eventually resulted in the removal of the remaining Yokuts from their native lands (Latta 1977). Native populations were dislocated from their traditional territories by ranchers and farmers, altering their traditional resources, landforms and waterways. This caused many Yokuts to turn to wage labor on farms and ranches, and other to settle on land set aside for them on the Fresno and Tule River Reservations

Historical Context

In 1859, local rural families organized to establish the Salem school that also served as a church and community center. Because of its proximity to the railroad crossing at the Mokelumne River, property owners approached the railroad in hopes of establishing a town (Hillman and Covello 1985). Lodi was first known as the Town of Mokelumne Station, founded by the Central Pacific Railroad. In 1874, to avoid confusion with two other towns, Mokelumne Hill in the foothills and Mokelumne City to the northwest, the name of Lodi was chosen (Gudde 1998:213).

The earliest industries in the area were agriculture, although a lumber mill established in 1877, and a flour mill established in 1876. Agricultural success was due to the unique qualities of the soil and climate in the area. The sandy loam south of the river is well adapted for vineyards and orchards. Airflow through Suisun Pass to the east cools the air at night, which is beneficial for grape crops. These conditions make Lodi well-suited to Flame Tokay grapes. In fact, L.M. Morse and his son Edmund are credited for having planted the first Tokay grapes in the Lodi area in 1892. The site of this notable economic event was the Morse-Skinner Ranch, which stands within the Study Area (and Project Area) today. Plantings of Tokay grapes increased in 1897 and irrigation started around 1920. Today, 97 percent of the Tokay grapes produced in the world are grown in the Lodi area.

Grape vines were superseded in importance during the 19th century by grain and watermelons (Hillman and Covello 1985). Melons became symbolic of local produce during the 1880's; many without irrigation and melon crops prepared the fields for wheat planting.

An 1887 mill fire burned all but three buildings in the center of Lodi, but reconstruction started almost immediately, mostly in inflammable brick. Post-fire building included the Lodi Opera House in 1905, a permanent library in 1909, and the first hospital established by Dr. R. A. Buchanan. Pacific Coast Producers, canners and can manufacturers; Holz Rubber Co., Valley Industries and Goehring Meat Company, producers of Victor brand products. The City of Lodi was incorporated in 1906.

Cultural Resources Investigation Methods and Results

Methods

Pacific Legacy, Inc. was contracted to assist in identifying cultural resources within the project APE. Identification activities were scoped to include, if necessary:

- (1) pre-field research and consultation;
- (2) field survey;
- (3) recording of no more than one archaeological site; and
- (4) preparation of a report of findings.

All project personnel met the professional standards described in *Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines*. Robert Jackson, M.A., served as Principal Investigator, Patricia Welsh, M.A. was Project Manager, and Mike Taggart, M.A., directed fieldwork. Steve Hilton, B.A., Janelle Walker, B.A., Nichole Jordan, B.A., and Megan Dunning, B.A. provided field support.

Pre-field Research

A records search was conducted by the Central California Information Center of the California Historical Resources Information system (CCIC) in February 2006. Records of cultural resource studies and previously recorded cultural resources with ¼ mile of the project area were consulted. Additionally, the following inventories were consulted:

- The National Register of Historic Places
- The California Register of Historical resources
- The California Inventory of Historic Resource (1976)
- The California Historical Landmarks (1996)
- The California Point of Historical Interest listing (May 1992 and update)
- The Historic Property Data File
- Archaeological Determinations of Eligibility
- CALTRANS State and Local Bridge Survey (1989 and update)
- Survey of Surveys (1989)
- GLO Plats
- Other pertinent historic data available at the CCIC for San Joaquin County

Results of the records search received from the CCIC are as follows:

Within The Study Area

- (1) No prehistoric resources were reported to the Information Center.
- (2) The Southern Pacific Railroad is recorded adjacent (west) to the project area; however, no site records are on file with the CCIC for the portion of this line within this 7.5' USGS quadrangle. Other recorded segments of the historic Southern Pacific Railroad in San Joaquin County have been designated P-39-000002 (CA-SJO-000250H).
- (3) The Morse-Skinner Ranch, listed on the National Register of Historic Places is located within the 220-acre Study Area.

Within One-Quarter Mile of the Study Area

- (1) No prehistoric resources have been reported to the Information Center.
- (2) Cherokee Memorial Park (cemetery) is located within one quarter mile of the Study Area. No site records are on file for this resource and it is not in the current Historic Property Data File.
- (3) No resources known to have value to local cultural groups have been reported to the CCIC within one quarter mile of the Study Area.

Previous Investigations Reported to CCIC Within the Project Area

- Optics Project Segment WS04: Sacramento to Bakersfield - SJ-3995 (Nelson 2000)

Previous Investigations Reported To CCIC Within One-Quarter Mile Of The Project Area

- Negative Archaeological Survey - SJ-4094 - Davis-King (2000)
- Cellular facility installation – Maggio Cir. /SC-13353A - SJ-6005 - Billat (2006)

Copies of the record search information are provided in Appendix B.

Native American Consultation

The initial effort to consult with Native Americans regarding the project was a letter sent on February 24th, 2006 to the Native American Heritage Commission (NAHC) requesting a search of the Sacred Lands Inventory File, and a current list of interested Native Americans of the area. On March 7th, 2006, Pacific Legacy received a letter from Ms. Debbie Pilas-Treadway of the NAHC. The NAHC letter identified ten individuals and groups with potential interest in the project and stated that no Sacred Lands are on file within the project area. Letters requesting information and/or concerns regarding the proposed project area were sent to the listed Native American contacts on March 8th, 2006 (Appendix A). Follow-up phone calls were made to the NAHC contacts on March 16th, 2006. No comments had been received from any of the notified NAHC contact persons. Conversations were held with four of the contacted NAHC persons (B. Elliston, R. Yonemura, G. Villa, Jr., and S. Burley). Ms. Billie Blue Elliston, Mr. Randy Yonemura, and Mr. Glen Villa, Jr. expressed no concerns with the project. Silvia Burley, Chairperson of the California Valley Miwok Tribe stated that a response letter had been mailed. This letter was subsequently received. Telephone messages were left with the other NAHC contacts, but no return calls have been received. Copies of correspondence with the NAHC and the contact persons are provided in Appendix C of the project's "Cultural Resources Inventory Report" (Appendix D of this EIR).

Field Analysis Methods

Pacific Legacy, Inc. conducted a systematic intensive pedestrian survey of the entire project area on March 7th, 2006. The project area was surveyed by a team of five archaeologists. The project APE was traversed in line abreast parallel transects spaced 15-30 meters apart. The spacing between transects varied slightly depending on terrain, vegetation, soil conditions, and residential structures. The southern portion of the survey area is planted with grape vines and visibility of mineral soils was between 85%-90%.

The ground surface in the northern portion of the survey area was obscured approximately 75% by grape vines, grass, or both. Ground surface visibility was reduced to only 10%-20% in grassy areas. Representative views of the Study Area were taken with an Olympus C-60 zoom Digital camera. Overview photos were taken from various locations and from different directions to show the area's environmental and physiographic setting, as well as ground visibility at the time of the survey.

An intensive cultural resources survey of 220-acres near the City of Lodi resulted in no prehistoric cultural materials or archaeological deposit discoveries during the pedestrian survey. Pre-field research of the Study Area did not identify any prehistoric

resources. Pre-field literature research did identify one historic cultural resource; the Morse-Skinner Ranch within the 220-acre Study Area. This ranch is listed in the National Register of Historic Places (NRHP #39-Z02052).

The survey identified a number of residences, unattached structures associated with the residences, a barn, and a commercial/industrial steel building housing a Moose Lodge within the 220-acre Study Area. Seven structures are situated within the 60-acres subject to the Development Plan for commercial and office space. The structures include the Morse/Skinner property (The Main Residence), a bungalow behind the main residence, a single-family residence adjacent to the Morse/Skinner residence, the Moose Lodge, two single-family residences, one at 13371 Highway 99 Frontage Road, the other at 13137 Highway 99 Frontage Road, and a single-family residence at 4044 E. Harney Road.

The Morse-Skinner Ranch House (13063 – 99 Frontage Road) is listed on the National Register of Historic Places and the California Register of Historical Resources. The remaining structures have not been evaluated for inclusion in the NRHP or CRHR.

Twelve residences are located within the remaining 160-acres of the Master Plan. The addresses of these residences are: 13125, 13167, 13275, 13297, 13323, 13355, 13387, 13409, 13475, 13415 located on the west side of West Stockton Boulevard, 13216 and 13322 located on the east side of West Stockton Boulevard. None of these properties have been subjected to evaluation for the NRHP or CRHR by a qualified Architectural Historian.

The Morse-Skinner Ranch was listed on the National Register in 1986. While the specific criteria are not cited in the NRHP nomination, it is clear that the property is significant under criteria A, B, and C. As the first property in the Lodi area credited with the growing of Flame Tokay grapes, the ranch is the scene of an event important to the economic development of the Lodi area. The property meets Criteria B because, L.M. Morse and his son, E.E. are credited with planting the first Tokay grapes on their property, as well as contributing significantly to the agricultural, financial, and educational growth of Lodi. The significance of the Morse/Skinner house is primarily architectural (Criterion C); the earlier Greek Revival building was altered with later, but compatible, Colonial Revival details, creating a handsome turn of the century property.

While the environment surrounding the Morse-Skinner house includes agricultural fields planted in grapes, it also contains more modern buildings that are inconsistent with the rural, agricultural setting of the ranch, including an adjacent Moose Lodge and residential buildings north and south of the Morse-Skinner ranch buildings (Figure 1-3). Since its nomination in 1984, a three and a half foot chain link fence that surrounded the ranch building complex has been replaced by a six-foot, white iron fence which visually separates the Morse-Skinner Ranch buildings from the remnant agricultural environment that still exists. The public would have difficulty associating the ranch buildings with surrounding agricultural enterprises that characterizes its history. Therefore, the agricultural setting or environment of the ranch has been substantially compromised and no longer contributes to an appreciation of the historic events and individuals that render the Morse-Skinner Ranch significant.

Recommendations for further consideration of this and the other cultural resources identified within the Study Area are offered in Section 5.0 of this report.

3.3.4. THRESHOLDS OF SIGNIFICANCE

The California Environmental Quality Act (CEQA) Guidelines, Appendix G indicates a project may be deemed to have a significant effect on the environment if it will:

1. Cause a substantial adverse change in the significance of a historic resource as defined in Section 15064.5 of the CEQA Guidelines;
2. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of the CEQA Guidelines;
3. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature; or
4. Disturb any human remains, including those interred outside of formal cemeteries.

3.3.5. PROJECT IMPACTS

Impact 3.3.1: Historic Resources – Less than Significant with Mitigation: The proposed project would adaptively reuse the Morse-Skinner Ranch House and water tower, a significant historic resource listed on the National Register of Historic Places (NRHP) and eligible for listing on the California Register of Historical Resources (CRHR). The proposed Development Plan and subsequent development of the balance of the 220-acre project site could result in the demolition of a Moose Lodge facility, 12 residences, and ancillary structures. None of these structures are known or expected to be historically significant per Section 15064.5 of the State CEQA Guidelines. However, none of these structures have been evaluated by an architectural historian for historic significance. As such, it cannot be precluded that the removal, alteration, or demolition of these structures would not result in significant impacts on historical resources.

The 220-acre parcel is proposed for development into office and commercial development within 60 acres fronting West Stockton Boulevard. The commercial and office development is described within the Development Plan and comprises the Project Area. The Concept Plan for the remaining 160 acres is preliminary, but entails the demolition of existing buildings and structures in advance of a planned medium and low-density residential development with school and fire station.

Two residences are situated within the 20 acres proposed for the Blue Shield office building, and two residences, one commercial/steel building housing the Moose Lodge, a barn, and agricultural fields are situated within the 40 acres proposed for the Retail commercial building. Literature research and a pedestrian survey of the Study Area identified the Morse-Skinner Ranch house located on 99 Frontage Road, less than one

mile south of Lodi, California. (The existing onsite land uses, including the Morse-Skinner Ranch house, are depicted on Figure 2.2.1 in the Project Description section of this EIR.) The ranch house and water tank stands on a one-acre remnant of a once larger, 200-acre ranch. The residence was built in vernacular Greek Revival style in 1869 and was altered in 1912 with the addition of Colonial Revival details. The Morse-Skinner Ranch and associated water tank are included in the National Register of Historic Places (NRHP) under three criteria (36 CFR 60.4(a-c). An NRHP property is defacto, eligible for the California Register of Historic Resources (CRHR). Mitigation Measure 3.3.1 requires the one acre parcel to be preserved in place. The project proposes to adaptively reuse the Morse-Skinner Ranch house. The proposed adaptive reuse of the Morse-Skinner structure is currently being evaluated for a future non-residential use.

The other remaining residential structures within the 60-acre Development Plan area, along with the Moose Lodge and barn, are not listed in, or determined to be eligible for either the NRHP or the California Register of Historical Resources, nor are they included in a local register of historical resources. The lack of listing does not mean that these structures are not historical resources as defined in PRDC sections 5020.1 (j) or 5024.1; they simply have not been evaluated. Mitigation Measure 3.3.2 requires the project proponent to conduct further testing and research to evaluate the potential for data recovery from the project site. This process includes the recording of the buildings and structures on Department of Parks and Recreation Historic Structures Forms (DPR 523). Any structures that are found to be ineligible for the CRHR warrant no further consideration. If any of those structures are determined to be CRHR eligible, however, the appropriate agency official should be consulted to determine the significance of the discovery, and plans should be developed to mitigate adverse changes to significant (CRHR eligible) resources.

Mitigation Measure 3.3.3, requires that further analysis and research be conducted on the remaining 160-acre Concept Plan area. The CRHR eligibility of existing buildings and structures within the Concept Plan will require the services of a qualified architectural historian. Once the resources have been evaluated, the effects of the proposed project can be determined, and further recommendations can be made to address any substantial adverse changes that might occur to historical resources through measures to avoid or mitigate the adverse changes to the significance of the historical resources.

Pursuant to Section 15064.5 of the CEQA Guidelines, substantial adverse change in the significance of a historical resource means “demolition, destruction, relocation, or alteration such that the significance of an historical resource or its immediate surroundings would be materially impaired.” Based on the scope of work that is proposed on the project site, the project will demolish or alter the physical characteristics of a portion of potentially historic elements on-site. However, Mitigation Measures 3.3.1 through 3.3.3 will ensure that the project would not significantly impact historic resources.

Impact 3.3.2: Archaeological Resources – Less than Significant with Mitigation: Although not anticipated, grading and construction activities onsite could encounter previously undiscovered archaeological resources.

An intensive cultural resources survey of 220-acres near the City of Lodi resulted in no archaeological deposit discoveries during the pedestrian survey. Pre-field research of the Study Area did not identify any prehistoric resources. The Yokuts who inhabited the project area prehistorically left no apparent archaeological remains on the ground surface within the Study Area. Previous studies in the Central Valley have shown that archaeological sites are sometimes buried (Moratto 1984). Cultural resources include, but are not limited to artifacts of stone, bone, shell, wood, and/or features that include hearths, structural remains, or dumps. However, if buried Native American archaeological resources are discovered during the project activities, Mitigation Measure 3.3.4 requires that work should stop immediately in the vicinity of the discovery, with a qualified archaeologist should be consulted to determine the significance of the discovery, and plans should be developed to mitigate adverse changes to significant (CRHR eligible) resources. Complying with Mitigation Measures 3.3.4 ensures the project will have no significant impacts on archaeological resources.

Impact 3.3.3: Paleontological and Unique Geologic Features – Less than Significant with Mitigation: Although not anticipated, grading and construction activities could encounter previously undiscovered paleontological resources.

The site is located in the southern portion of the Sacramento Valley, which is bordered by the Sierra Nevada Range to the east and the Diablo Ranges to the west. Large coalescing alluvial fans have developed along each side of the valley. The larger and more gently sloping fans occur on the east side and consist of deposits derived from rock sources in the Sierra Nevada. This region is characterized by a 400-mile long and 50-mile wide northwest-southeast trending valley. The valley has been filled with a thick sequence of marine and nonmarine sediments from the late Jurassic to Holocene. The uppermost strata of the valley consist of alluvial, flood and delta plains of two major rivers (Sacramento and San Joaquin rivers) and their tributaries. The Sacramento-San Joaquin Delta is located west of the project site.

The valley deposits are derived from the Coast Ranges to the west and the Sierra Nevada to the east. Granitic and metamorphic rocks outcrop along the eastern and southeastern flanks of the valley. Marine sedimentary rocks outcrop along the eastern and southeastern flanks of the valley. Marine sedimentary rocks outcrop along most of the western, southwestern, southern and southeastern flanks; and volcanic rocks and deposits outcrop along the northeastern flanks of the valley. The valley geomorphology includes dissected uplands, low alluvial plains and fans, river flood plains and channels, and overflow lands and lake bottoms.

The project site does not contain any natural drainage courses, ridgelines, or other distinct topographic features. The site contains no exposed bedrock and the alluvium that covers the site is estimated to be 400-500 feet deep. Thus, the site does not contain any unique geologic features. Further, an intensive cultural resources survey of 220-acres near the City of Lodi resulted in no paleontological deposit discoveries during

the pedestrian survey. Pre-field research of the Study Area did not identify any prehistoric resources, and the young alluvial materials that blanket the project site are not known or expected to contain paleontological resources. There is the potential that older sediments underlying the young alluvium may contain vertebrate fossils. Paleontological resources could only be discovered onsite by deep excavations into older Quaternary deposits or underlying bedrock.

Based on the preceding discussion above, a Paleontological Resource Impact Mitigation Program (PRIMP) will not be required. Although it is not expected that the proposed project would destroy a unique paleontological resource or geologic feature, Mitigation Measure 3.3.5 imposes a halt-work condition if paleontological resources are discovered during grading or construction. With the incorporation of Mitigation Measure 3.3.5 the project would not significantly impact paleontological resources.

Impact 3.3.4: Disturbance of Human Remains – Less than Significant Impact: The project site is not known or expected to contain human remains and, as such, the proposed project is not expected to disturb human remains. In the unlikely event that human remains are discovered onsite, existing regulations ensure such remains are handled appropriately.

The project site is not part of a formal cemetery and is not known to have been used for disposal of historic or prehistoric human remains. Thus, human remains are not expected to be encountered during construction activities. Therefore, the proposed project would not disturb any human remains, including those interred outside of formal cemeteries.

In the unlikely event that human remains are encountered during project construction, Public Health and Safety Code Section 5097.98 requires the project to halt until the County Coroner has made the necessary findings as to the origin and disposition of the remains. The County Coroner must be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner will notify the Native American Heritage Commission (NAHC), which will determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and times associated with Native American burials.

3.3.6. CUMULATIVE IMPACTS

A cumulative impact occurs when a proposed project, in combination with other past, current and probable future projects will have an impact on the environment. One historic building and other structures of unknown historical value have been identified on the project site isolated from other past, current and probable future projects. However, Mitigation Measures have been included in this EIR that ensure that the proposed project would not substantially change the significance of any historical, archeological, or paleontological resources. Therefore, the project's contribution to the loss of resources within the region associated with development is less than considerable.

3.3.7. MITIGATION MEASURES

Mitigation Measure 3.3.1: The Morse-Skinner Ranch House and water tank, including the one acre parcel on which it is situated, is listed on the NRHP and it is therefore a historical resource eligible for the CRHR. Any adaptive reuse of the Morse-Skinner Ranch property shall comply with standards set forth by the Secretary of the Interior.

Mitigation Measure 3.3.2: The residences, barn, and Moose Lodge that are situated within the 60 acres included in the Development Plan shall be evaluated for the CRHR. Some of these resources, such as the Moose Lodge, were clearly constructed within the last 50 years and are unlikely to be eligible for the CRHR. However, some of the residences may be more than 50 years old and their architectural significance shall be evaluated by a qualified architectural historian. This process includes the recording of the buildings and structures on Department of Parks and Recreation Historic Structures Forms (DPR 523). Any structures that are found to be ineligible for the CRHR warrant no further consideration. If any of those structures are determined to be CRHR eligible, the California Office of Historic Preservation (OHP) shall be consulted to determine the significance of the discovery, and any resources that are CRHR eligible shall be treated in accordance with the Secretary of Interior Standards.

Mitigation Measure 3.3.3: The CRHR eligibility of existing buildings and structures within the 160-acre Concept Plan shall be determined. This will require the services of a qualified architectural historian. This process includes the recording of the buildings and structures on Department of Parks and Recreation Historic Structures Forms (DPR 523). Any structures that are found to be ineligible for the CRHR warrant no further consideration. If any of those structures are determined to be CRHR eligible, the California Office of Historic Preservation (OHP) shall be consulted to determine the significance of the discovery, and any resources that are CRHR eligible shall be treated in accordance with the Secretary of Interior Standards.

Mitigation Measure 3.3.4: The Yokuts who inhabited the project area prehistorically left no apparent archaeological remains on the ground surface within the Study Area. Previous studies in the Central Valley have shown that archaeological sites are sometimes buried (Moratto 1984). If buried Native American archaeological resources are discovered during the project activities, work shall stop immediately in the vicinity of the discovery, until a qualified archaeologist that meets the satisfaction of the City of Lodi determines the significance of the discovery and develops plans to preserve the significance of any discovered CRHR eligible resources. Such archaeological resource preservation plans shall be implemented to the satisfaction of the City of Lodi.

Mitigation Measure 3.3.5: Should paleontological resources be encountered during construction excavation, the project proponent shall halt excavation in the vicinity of the discovery and contact a qualified vertebrate paleontologist to evaluate the significance of the find and make recommendations for collection and preservation of discovered paleontological resources in a written report to the City of Lodi. Said recommendations shall be implemented to the satisfaction of the City of Lodi.

3.3.8 LEVEL OF SIGNIFICANCE AFTER MITIGATION

With the incorporation of Mitigation Measures 3.3.1-3.3.5, the proposed project would not significantly impact cultural resources. The following table is a summary of the thresholds of significance, potential impacts, and associated mitigation measures.

**TABLE 3.3.1:
SUMMARY OF CULTURAL RESOURCE THRESHOLDS OF SIGNIFICANCE,
IMPACTS, AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measure	Level of Significance
Cause a substantial adverse change in the significance of a historic resource as defined in Section 15064.5 of the CEQA Guidelines	<p>Mitigation Measure 3.3.1: The Morse-Skinner Ranch House and water tank, including the one acre parcel on which it is situated, is listed on the NRHP and it is therefore a historical resource eligible for the CRHR. Any adaptive reuse of the Morse-Skinner Ranch property shall comply with standards set forth by the Secretary of the Interior.</p> <p>Mitigation Measure 3.3.2: The residences, barn, and Moose Lodge that are situated within the 60 acres included in the Development Plan shall be evaluated for the CRHR. Some of these resources, such as the Moose Lodge, were clearly constructed within the last 50 years and are unlikely to be eligible for the CRHR. However, some of the residences may be more than 50 years old and their architectural significance shall be evaluated by a qualified architectural historian. This process includes the recording of the buildings and structures on Department of Parks and Recreation Historic Structures Forms (DPR 523). Any structures that are found to be ineligible for the CRHR warrant no further consideration. If any of those structures are determined to be CRHR eligible, the California Office of Historic Preservation (OHP) shall be consulted to determine the significance of the discovery, and any resources that are CRHR eligible shall be treated in accordance with the Secretary of Interior Standards.</p> <p>Mitigation Measure 3.3.3: The CRHR eligibility of existing buildings and structures within the 160-acre Concept Plan shall be determined. This will require the services of a qualified architectural historian. This process includes the recording of the buildings and structures on Department of Parks and Recreation Historic Structures Forms (DPR 523). Any structures that are found to be ineligible for the CRHR warrant no further consideration. If any of those structures are determined to be CRHR eligible, the California Office of Historic Preservation (OHP) shall be consulted to determine the significance of the discovery, and any resources that are CRHR eligible shall be treated in accordance with the Secretary of Interior Standards.</p>	Less than Significant Impact After Mitigation
Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5 of	Mitigation Measure 3.3.4: The Yokuts who inhabited the project area prehistorically left no apparent archaeological remains on the ground surface within the Study Area.	Less than Significant Impact After Mitigation

**TABLE 3.3.1:
SUMMARY OF CULTURAL RESOURCE THRESHOLDS OF SIGNIFICANCE,
IMPACTS, AND MITIGATION MEASURES**

Threshold of Significance	Mitigation Measure	Level of Significance
the CEQA Guidelines	Previous studies in the Central Valley have shown that archaeological sites are sometimes buried (Moratto 1984). If buried Native American archaeological resources are discovered during the project activities, work shall stop immediately in the vicinity of the discovery, until a qualified archaeologist that meets the satisfaction of the City of Lodi determines the significance of the discovery and develops plans to preserve the significance of any discovered CRHR eligible resources. Such archaeological resource preservation plans shall be implemented to the satisfaction of the City of Lodi.	
Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature	Mitigation Measure 3.3.5: Should paleontological resources be encountered during construction excavation, the project proponent shall halt excavation in the vicinity of the discovery and contact a qualified vertebrate paleontologist to evaluate the significance of the find and make recommendations for collection and preservation of discovered paleontological resources in a written report to the City of Lodi. Said recommendations shall be implemented to the satisfaction of the City of Lodi.	Less than Significant Impact After Mitigation
Disturb any human remains, including those interred outside of formal cemeteries	No mitigation measures required. Public Health and Safety Code Section 5097.98, as described in the discussion of Impact 3.3.4 on page 3.3-13 further reduces the potential for impacts to human remains.	Less than Significant Impact